From: Karen Mulholland
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 9:28:19 PM

I strongly oppose OGE's proposed legal expense fund regulation *as drafted*. OGE should make the following changes before issuing this regulation:

- **Remove the exception making compliance optional.** Compliance must be mandatory, or it is no regulation at all - merely a polite suggestion.
- Replace the proposed recusal requirement with a minimum 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests.
- Remove the example involving an accused sexual harasser, which is deeply offensive.
- Place 501(c)(3) organizations on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

As the agency entrusted with the task of holding government officials to ethical standards, OGE has a unique responsibility to ensure that its regulations do, in fact, promote and demand ethical behavior.

Thank you.

Karen Mulholland
Minneapolis, MN